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CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

BY ________ DEPUTY CLERK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

UNITED STATES OF AMERICA,	§	CRIMINAL NO.: SA 13 CR 0971 FB
Plaintiff,	§	**INDICTMENT**
	§	
VS.	§	[Ct 1: 18 U.S.C. §922(g)(1), Possession
	§	of a Firearm or Ammunition By a
RANDON ROMERO,	§	Convicted Felon; Ct 2: 18 U.S.C. §924(c),
Defendant.	§	Carrying Firearms During and in
	§	Relation to a Drug Trafficking Crime; Ct 3,
	§	21 U.S.C. § 841(a)(1), Possession with
	§	Intent to Distribute Methamphetamine.]

THE GRAND JURY CHARGES:

COUNT ONE
[18 U.S.C. §922(g)(1)]

That on or about October 18, 2013, within the Western District of Texas, the Defendant,

RANDON ROMERO,

who having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce, a firearm, to-wit: a Bauer, model Bauer Automatic, .25 caliber pistol, serial number 192471; which had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO
[18 U.S.C. § 924(c)]

That on or about October 18, 2013, in the Western District of Texas, Defendant,

RANDON ROMERO,

did knowingly use and carry a firearm, to wit: a Bauer, model Bauer Automatic, .25 caliber pistol, serial number 192471, during and in relation to, and did possess said firearm in furtherance of, a drug trafficking crime that may be prosecuted in a court of the United States, that is Possession with Intent to Distribute less than 5 grams of methamphetamine in violation of 21 United States Code §841(a)(1), as further described in Count Three, in violation of Title 18, United States Code, Section 924(c).

COUNT THREE
[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C)]

That on or about October 18, 2013, in the Western District of Texas, Defendant,

RANDON ROMERO,

did unlawfully, knowingly, and intentionally possess with intent to distribute a controlled substance, which offense involved less than 5 grams of methamphetamine (actual), a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(C).

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE

I.
Firearm Forfeiture Statutes and Violations
[Title 18 U.S.C. §§ 922(g)(1) and 924(c),subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461. *See* Fed.R.Crim.P. R 32.2]

As a result of the foregoing criminal violations set forth in Counts One and Two, which are punishable by imprisonment for more than one year, Defendant shall forfeit the below described property to the United States of America pursuant to Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461, which states:

Title 18 U.S.C. § 924

> **(d)(1)** Any firearm or ammunition involved in or used in any knowing violation of subsection ...(g) ...of section 922. . . or knowing violation of section 924,. . . shall be subject to seizure and forfeiture under the provisions of this chapter...

This Notice of Demand for Forfeiture includes, but is not limited to the following properties described below in paragraph II .

II.

Personal Properties

(1) A Bauer, model Bauer Automatic, .25 caliber pistol, serial number 192471; and,

(2) Assorted ammunition.

A TRUE BILL

[redacted]

FOREPERSON OF THE GRAND JURY

ROBERT PITMAN
UNITED STATES ATTORNEY

BY: SARAH WANNARKA
Assistant United States Attorney